

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

DAMONIE EARL, LINDA RUGG, ALESA
BECK, TIMOTHY BLAKEY, JR.,
STEPHANIE BLAKEY, MARISA
THOMPSON, MUHAMMAD MUDDASIR
KHAN, ELIZABETH COOPER, JOHN
ROGERS, VALERIE MORTZ-ROGERS,
and LAKESHA GOGGINS, each individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

THE BOEING COMPANY and
SOUTHWEST AIRLINES CO.,

Defendants.

Civil Action No. 4:19-cv-00507

DECLARATION OF JOHN M. PIERCE

I, John M. Pierce, hereby declares, under penalty of perjury, as follows:

1. I am the Managing Partner of Pierce Bainbridge Beck Price & Hecht LLP¹ ("PB"). I am over 21 years of age and am not a party to this action. I make this declaration based upon my personal knowledge of the facts asserted herein, and if called to testify, I could and would testify competently thereto. I submit this declaration in support of Hecht Partners LLP's Response to Defendants' Motion to Show Authority.

¹ The firm is in the process of changing its name to remove, *inter alia*, "Hecht" as David L. Hecht is no longer a partner.

2. David L. Hecht and Andrew J. Lorin remain as of counsel to PB in connection with the above captioned matter and are authorized by PB to act on PB's behalf in connection with this matter.

Dated June 22, 2020


John M. Pierce